

226899

STATE OF SOUTH CAROLINA

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

(Caption of Case)

Complaint and Petition for Relief of
BellSouth Telecommunications,
Incorporated d/b/a AT&T Southeast d/
b/a AT&T South Carolina v. OneTone
Telecom, Incorporated

COVER SHEET

DOCKET/NDI

NUMBER: 2010 - 17 - c

Posted: led

Dept: S.A.

Date: 11/23/10

(Please type or print)

Submitted by: John Pringle

SC Bar Number: 11208

Time: 4:45

Telephone: 343-1270

Address: P.O. Box 2285

Fax:

Columbia SC 29202

Other:

Email: jpringle@ellislawhorne.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition

☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input checked="" type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input checked="" type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

RECEIVED

NOV 23 2010

PSC SC
CLERK'S OFFICE

ELLIS:LAWHORNE

John J. Pringle, Jr.
Direct dial: 803/343-1270
jpringle@ellislawhorne.com

November 23, 2010

RECEIVED

NOV 23 2010

PSC SC
CLERK'S OFFICE

FILED ELECTRONICALLY

The Honorable Jocelyn G. Boyd
Clerk
South Carolina Public Service Commission
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Complaint and Petition for Relief of BellSouth Telecommunications, Inc. d/b/a AT&T Southeast d/b/a AT&T South Carolina v. Affordable Phone Services, Inc. d/b/a High Tech Communications, Dialtone & More, Inc., Tennessee Telephone Service, LLC d/b/a Freedom Communications USA, LLC, OneTone Telecom, Inc., dPi Teleconnect, LLC and Image Access, Inc., d/b/a New Phone
Docket No. 2010-14-C, Docket No. 2010-15-C, Docket No. 2010-16-C,
Docket No. 2010-17-C, Docket No. 2010-18-C, & Docket No. 2010-19-C

Dear Ms. Boyd:

Enclosed please find the **Verified Application for Admission *Pro Hac Vice* of Paul Francis Guarisco** for filing on behalf of the Respondent, Image Access, Inc., d/b/a New Phone in the above-referenced dockets. By copy of this letter, I am serving the originals of these documents, along with the requested filing fee with the Supreme Court and serving all parties of record with this document and I enclose my certificate of service to that effect.

If you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,

s/ John J. Pringle, Jr.
John J. Pringle, Jr.

cc: C. Lessie Hammonds, Esquire (via electronic mail service)
Patrick W. Turner (via electronic mail service)
Henry M. Walker, Esquire (via electronic mail service)
Christopher Malish (via electronic mail service)
Paul F. Guarisco, Esquire (via electronic mail service)

Enclosures

**VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*
IN THE STATE OF SOUTH CAROLINA**

BellSouth Telecommunications,
Incorporated d/b/a AT&T Southeast d/b/a
AT&T South Carolina

2010-14--19-C

South Carolina Public Service
Commission

Plaintiff

Case No.

Court

vs.

Mailing Address of Court: Post Office Drawer 11649
Columbia South Carolina 29211

Affordable Phone Services, Incorporated
d/b/a High Tech Communications,
Dialtone & More Incorporated, Tennessee
Telephone Service, LLC d/b/a Freedom
Communications USA, LLC, OneTone
Telecom, Incorporated, dPi Teleconnect,
LLC, and Image Access, Incorporated
d/b/a New Phone

Defendant

Comes now Paul Francis Guarisco, applicant herein, and respectfully represents the following:

1. Applicant resides at:

17662 Chancellorsville Avenue

Street Address

Baton Rouge

East Baton Rouge Parish

LA

70817

City

County

State

Zip Code

225-752-1253

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Phelps

Dunbar, LLP, with offices at, at

II City Plaza-400 Convention Street-Suite 1100

Street Address

Baton Rouge

East Baton Rouge Parish

LA

70821-4412

City

County

State

Zip Code

225-376-0241

Telephone

225-381-9197

Fax Number

3. Applicant has been retained personally or as a member of the above named law firm by Image Access, Inc. d/b/a NewPhone to provide legal representation in connection with the above case now pending before the above named court of the State of South Carolina.

4. Since April of 1993, applicant has been, and presently is, a member in good standing of the bar of the highest court of the District of Columbia or the State of LA where applicant regularly practices law. Attached is a certificate of good standing.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:	Date Admitted:
Louisiana Supreme Court	April 23, 1993
United States District Court Eastern District of Louisiana	February 9, 1994
United States District Court Middle District of Louisiana	March 18, 1997

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below:
(List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court, date):

None

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

None

8. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked, except as provided below (give particulars, e.g., date, administrative body, date of suspension and reinstatement):

None

9. Local counsel of record associated with applicant in this case is John J. Pringle, Jr., of the Ellis, Lawhorne & Sims, P.A. law firm, which has offices at:

1501 Main Street, 5th Floor

Street Address

Richland

County

803/343-1270

Telephone

Columbia

City

South Carolina

State

29202

Zip Code

If applicable list all other firms/attorneys you are associated with in this matter

None

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

None

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

DATED this 19th day of November, 2010.

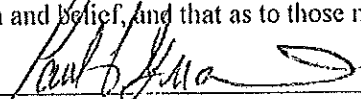

APPLICANT

VERIFICATION

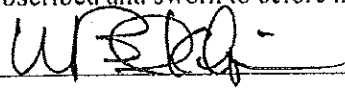
STATE OF LOUISIANA)

COUNTY OF EAST BATON ROUGE PARISH)

I, Paul Francis Guarisco, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.


APPLICANT/AFFIANT

Subscribed and sworn to before me this 19th day of November, 2010.



Notary Public for the State of LOUISIANA

My Commission Expires: _____

William Bradley Kilne
Bar Roll No. 32530
Notary Public, State of Louisiana
My Commission is for Life

LOCAL COUNSEL CONSENT

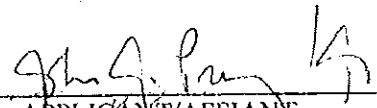
I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 23rd day of November, 2010.


LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this 23rd day of November, 2010.


APPLICANT/AFFIANT

Louisiana State Bar Association

The Louisiana State Bar Association hereby certifies that _____

Mr. Paul Francis Guarisco

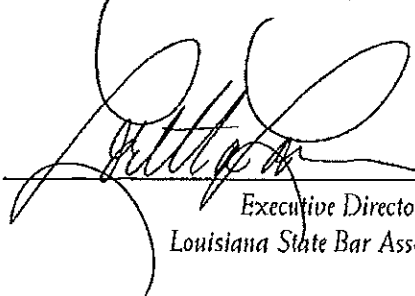
_____ II City Plaza
whose address is 400 Convention St Ste 1100

_____ Baton Rouge, LA 70821

is a member in good standing of the Louisiana State Bar Association as of this date, and that
said person was duly admitted to practice in the courts of the State of Louisiana on the

_____ 23rd day of April 1993

Given over my hand and the Seal of the Louisiana State Bar Association, this _____ 18th
day of November 2010



Executive Director
Louisiana State Bar Association

United States of America

State of Louisiana

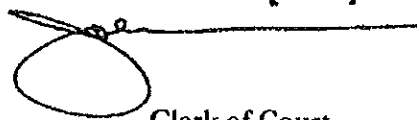
Supreme Court of the State of Louisiana

I, JOHN TARLTON OLIVIER, Clerk of the Supreme Court of the State of Louisiana,
do hereby certify that

PAUL FRANCIS GUARISCO, ESQ., #22070

was duly admitted and licensed to practice as an attorney and counselor at law in this Court
and the several courts of the State of Louisiana, on the 23rd Day of April, 1993 A.D.; and is
currently in good standing, and sufficiently qualified to perform the duties of an attorney and
counselor at law.

IN WITNESS WHEREOF, I hereunto sign
my name and affix the seal of this Court, at
the City of New Orleans, this the 19th Day of
November, 2010, A.D.


Clerk of Court
Supreme Court of Louisiana

DOCKET NO. 2010-14 --19-C

**Complaint and Petition for Relief of
BellSouth Telecommunications, Inc.
d/b/a AT&T Southeast d/b/a AT&T
South Carolina v. Affordable Phone
Services, Inc. d/b/a High Tech
Communications, Dialtone & More,
Inc., Tennessee Telephone Service, LLC
d/b/a Freedom Communications USA,
LLC, OneTone Telecom, Inc., dPi
Teleconnect, LLC and Image Access,
Inc., d/b/a New Phone**

CERTIFICATE OF SERVICE

November 23, 2010
Columbia, South Carolina

PHELPS DUNBAR, L.L.P.

OPERATING ACCOUNT

CHECK NO.106583

DATE	INVOICE #	G/L #	INVOICE DESCRIPTION	AMOUNT PAID
11/18/10	111810	202010100000	23085.9 Guarisco/Lewis	250.00

THIS MULTITONE AREA OF THE DOCUMENT CHANGES COLOR GRADUALLY AND EVENLY FROM DARK TO LIGHT WITH DARKER AREAS BOTH TOP AND BOTTOM

JP Morgan Chase Bank, N.A.
New Orleans, Louisiana

PHELPS DUNBAR, L.L.P.
365 Canal Street, Suite 2000
New Orleans, Louisiana 70130-6534

CHECK NO. 106583

84-13/654

DATE 11/18/10

CHECK AMOUNT

\$*****250.00

PAY TWO HUNDRED FIFTY AND 00/100 DOLLAR

VOID AFTER 180 DAYS

TO THE
ORDER OF

Supreme Court of South Carolina
P.O. Box 11330
Columbia, SC 29211

BATON ROUGE OPERATING ACCOUNT

BATON ROUGE OPERATING, LA

THE ORIGINAL DOCUMENT HAS A REFLECTIVE WATERMARK ON THE BACK. HOLD AT AN ANGLE TO VIEW WHEN CHECKING THE ENDORSEMENT.